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15 **FATDOOR, INC., RAJ V. ABHYANKER**

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA

18 SAN FRANCISCO DIVISION

19 **FATDOOR, INC.**, a Delaware corporation,
20 and **RAJ ABHYANKER**, an individual,

21 Plaintiffs,

22 vs.

23 **NEXTDOOR.COM, INC.**, a Delaware
24 corporation,

25 Defendant.

Case No.

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

26 Plaintiffs Fatdoor, Inc. and Raj Abhyanker allege the following:

27 **PARTIES, JURISDICTION AND VENUE**

28 1. Plaintiff **FATDOOR, INC.** is a Delaware corporation, with principal place of
business in Mountain View, California. Plaintiff Raj Abhyanker is an individual residing in
Cupertino, California.

1 '091 Patent claims priority, said disclosure occurring long before Defendant began to use that
2 same domain name to infringe the '091 Patent. Copies of selected screenshots from Defendant's
3 website are attached hereto as **Exhibit B** and incorporated herein by reference as an overview of
4 the methods employed and the products and services made, used, offered for sale and sold by the
5 Defendant, although the Defendant's infringing activities are not limited to those depicted in
6 **Exhibit B**. By making and using the www.nextdoor.com website and by making, using offering
7 to sell and/or selling the Defendant's goods or services of nextdoor.com, the Defendant has
8 infringed and continues to infringe one or more claims of the '091 Patent.

9
10 8. Defendant's acts of infringement described herein have caused and, unless
11 restrained and enjoined by this Court, will continue to cause Plaintiffs to suffer damages in an
12 amount to be proven at trial as well as further irreparable damage, loss, and injury for which
13 Plaintiff has no adequate remedy at law.

14 **CAUSE OF ACTION (Infringement of '091 Patent)**

15 9. Plaintiff repeats and realleges each and every allegation contained in Paragraphs
16 1-9 with the same force and effect as if set forth fully herein.

17 10. Defendant's actions described herein constitute direct infringement of the '091
18 Patent, in violation of 35 U.S.C. § 271(a).

19 11. Defendant's infringement of the '091 Patent has caused, and will continue to cause Plaintiff
20 to suffer damages in an amount to be proven at trial, for which Plaintiff is entitled to be compensated pursuant
21 to 35 U.S.C. § 284.

22 12. Plaintiff has suffered and continues to suffer irreparable injury resulting from Defendant's
23 infringement of the '091 Patent, for which Plaintiff has no adequate remedy at law.

24 13. On information and belief Defendant's infringement of the '091 Patent will continue, and the
25 Plaintiff will continue to suffer the resulting irreparable injury, unless and until such acts are restrained and
26 enjoined by this Court.

REQUEST FOR RELIEF

Wherefore, Plaintiff respectfully requests entry of judgment in its favor and against Defendant as follows:

- A. That Defendant has directly infringed the '091 Patent;
- B. That Defendant and its officers, agents, affiliates, parent and subsidiary corporations, employees, attorneys, and representatives, and all those acting in concert or participation with them, be preliminarily and permanently enjoined from making, using, offering for sale, and/or selling within the United States any method, product, service, website, or device that infringes any claim of the '091 Patent;
- C. That Plaintiff shall recover from Defendant damages adequate to compensate Plaintiff for infringement of the '091 Patent, pursuant to 35 U.S.C. § 284;
- D. That Plaintiff shall recover from Defendant its litigation expenses, including costs and reasonable attorneys' fees, pursuant to 35 U.S.C. § 285, and other applicable laws; and
- E. That Plaintiff has such other, further, or different relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Fed. R. Civ. P. 38 and Civil L.R. 3-6, Plaintiffs demand a jury trial on issues triable to a jury.

1 Dated: May 20, 2014

Respectfully submitted,

2 LEGALFORCE RAJ ABHYANKER, P.C.

3
4 By /s/ Scott J. Allen

5 Scott J. Allen
6 Nick Gerovac
7 Roy Montgomery
8 Bruno W. Tarabichi

9 Attorneys for Plaintiffs
10 FATDOOR, INC. and Raj Abhyanker
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